

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	
	§	Chapter 11
CJ HOLDING CO., <i>et al.</i> , <sup>1</sup>	§	
	§	Case No. 16-33590 (DRJ)
Debtors.	§	
	§	(Jointly Administered)
	§	

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**MOTION FOR PERMISSION TO WITHDRAW  
AS COUNSEL OF RECORD FOR JUAN PATINO**

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number (if any), are: CJ Holding Co. (4586); Blue Ribbon Technology Inc. (6338); C&J Corporate Services (Bermuda) Ltd.; C&J Energy Production Services-Canada Ltd.; C&J Energy Services, Inc. (3219); C&J Energy Services Ltd.; C&J Spec-Rent Services, Inc. (0712); C&J VLC, LLC (9989); C&J Well Services Inc. (5684); ESP Completion Technologies LLC (4615); KVS Transportation, Inc. (2415); Mobile Data Technologies Ltd.; Tellus Oilfield Inc. (2657); Tiger Cased Hole Services Inc. (7783); and Total E&S, Inc. (5351). The location of the Debtors' service address is 3990 Rogerdale, Houston, Texas 77042.

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**COMES NOW**, Walker & Patterson, P.C., and requests the Court to permit it to withdraw as counsel of record for Juan Patino, a creditor with a claim in the CJ Holding Co. case (Claim #847) and a claim in the KVS Transportation, Inc. case (Claim #48), and would respectfully show the Court as follows:

1. Juan Patino filed class claims in both the CJ Holding Co. case, and the KVS Transportation, Inc. case.
2. Mr. Patino contacted Walker & Patterson through his California representation the Setareh Law Group/Shawn Setareh.
3. Communication between Walker & Patterson, and Mr. Patino and his California representatives has broken down, and Walker & Patterson is not able to adequately represent Mr. Patino or his interests in these bankruptcy cases any longer.
4. I contacted Mr. Patino through Mr. Setareh regarding the requested relief on May 11, 2017. I have not received a response.
5. There are currently no pending matters that Mr. Patino needs to be aware of.

**WHEREFORE**, Walker & Patterson, P.C. requests the Court to allow them to withdraw from their representation of creditor Juan Patino, and to grant them such other and further relief, at law or in equity, to which they may be justly entitled.

Dated: May 23, 2017

Respectfully submitted,

By: /s/ Johnie Patterson

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served by electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case and by first class United States Mail, postage prepaid, to Juan Patino, c/o Shaun Setareh, Suite 907, 9454 Wilshire Blvd., Beverly Hills, CA 90212 and by electronic transmission to [shaun@setarehlaw.com](mailto:shaun@setarehlaw.com), and to all parties appearing on the attached Service List on May 23, 2017.

/s/ Johnie Patterson  
Johnie Patterson

### **SERVICE LIST**

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